

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

D-1 Kyree Wilson,
D-2 Brandon Jones,
D-3 Jaleel Wiley,
D-4 Janeil Wiley

Case No.

Case: 2:22-mj-30394

Assigned To : Unassigned

Assign. Date : 9/14/2022

Description: RE: SEALED
MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 19, 2022 through August 26, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2118(b)

Robberies and Larcenies Involving Controlled Substances.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 14, 2022City and state: Detroit, MI*Complainant's signature*Matthew P. Allwes, Special Agent, FBI*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

INTRODUCTION

1. I am a Special Agent with the FBI and have been since September of 2019. I am currently assigned to the FBI Detroit Division's Violent Crime Task Force (VCTF). Prior to working at the FBI, I was a Border Patrol Agent for four years in Douglas, Arizona. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. I have conducted investigations of federal and state violations concerning crimes of violence, firearms, narcotics trafficking related crimes, and bank theft. I have gained experience through training and everyday work related to these types of investigations. My duties involve the investigation of violent crimes, to include investigations related to narcotics trafficking, the use of cellular devices to commit federal criminal offenses, and the available technology that can be used by law enforcement to assist in identifying the users of cellular devices and their location. I have experience in the investigation, apprehension, and prosecution of individuals involved in federal criminal offenses.

3. The statements contained in this Affidavit are based on my experience and background as a Special Agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel, communications

with others who have personal knowledge of the events and circumstances described herein, and information gained through training and experience.

4. The information set forth in this affidavit is based on my review of information from other law enforcement agents and investigators, witnesses, and individuals with knowledge of this matter; my investigation; my review of documents, photographs, and videos; and information gained through my training and experience. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that KYREE WILSON (DOB XX/XX/2003), BRANDON JONES (DOB XX/XX/2003), JALEEL WILEY (DOB XX/XX/2000) and JANEIL WILEY (DOB XX/XX/2000) violated 18 U.S.C. § 2118(b) (Robberies and Burglaries Involving Controlled Substances).

5. The FBI Detroit VCTF, is investigating more than twelve burglaries of businesses, including DEA registered pharmacies throughout the metro Detroit area. The suspects enter the DEA Registered pharmacies with their faces concealed by masks and hooded sweatshirts, then they jump the counters and demand high-value controlled substances, and U.S. Currency.

6. During the course of the investigation, agents and officers have compared many of the surveillance videos from the businesses that were robbed. The businesses appear to have been robbed in the same fashion by multiple unknown males wearing face masks, using either stolen vehicles and or various different types of rental vehicles. Based on the review of those videos, I believe that the suspects are coordinated and have worked together before, such that they developed experience in order to successfully plan and rob these DEA registered pharmacies. During the robberies, this group of suspects appear to consistently use a lookout and getaway driver in order to beat the police response time.

PROBABLE CAUSE

7. The FBI is investigating Kyree WILSON (DOB XX/XX/2003), Brandon JONES (DOB XX/XX/2003), Jaleel WILEY (DOB XX/XX/2000), Janeil WILEY (DOB XX/XX/2000), for suspected violations of 18 U.S.C. § 2118(b) (Robberies and Larcenies Involving Controlled Substances). A person violates 18 U.S.C. § 2118(b) when he or she without authority, enters or attempts to enter, or remains in, the business premises or property of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act (21 U.S.C. 822) with the intent to steal any material or compound containing any quantity of a controlled substance.

8. A review of Kyree WILSON's criminal history (CCH) revealed no felony charges. A review of Brandon JONES' revealed a felony conviction (HYTA) in the 3rd Circuit Court-Wayne County, Michigan, on 11/30/2020. A review of Jaleel WILEY's CCH revealed a felony Weapons-Carry Concealed conviction (HYTA) in the 3rd Circuit Court-Wayne County, Michigan, on 1/28/2022. A review of Janeil WILEY's CCH revealed a felony Controlled Substance conviction (HYTA) on 8/6/2021 in the Wayne County, Michigan-3rd Circuit Court

The robbery of the iPharmacy in Livonia on July 19, 2022

9. On July 19, 2022, at 1851 hours, Livonia Police Department (LPD) Dispatch aired that an armed robbery was occurring at iPharmacy (a DEA registered pharmacy) located at 31193 Plymouth Road, Livonia, Michigan. Dispatch advised the suspect(s) left eastbound on Plymouth Road in a Jeep Grand Cherokee possibly dark green in color (V1). LPD R3 (Reserve Officers) were immediately in the area and located the vehicle (green Jeep Grand Cherokee with black rims) leaving the parking lot eastbound on Plymouth Road. A license plate was not seen on the vehicle. LPD R3 advised the vehicle (V1) was traveling through Milburn Street at a high rate of speed.

10. According to the surveillance video at the iPharmacy, two subjects, S1 and S2, entered the store around 1849 hours. S2 and S3, the driver of the green

Jeep, observed LPD unit R3 across the street and yelled/motioned for S1 to leave. S2 and S1 both entered the back seat of V1 and the vehicle left the lot eastbound on Plymouth Road at approximately 1853 hours.

11. Upon arrival, LPD officers observed pill bottles laying on the ground directly in front of the pharmacy doors and fresh footprints in the dirt. iPharmacy employees stated S1 entered the store and jumped over the counter into the back. S1 then demanded that employees turn over several controlled medications including Norco, Percocet, Oxycodone, Codeine, and Adderall from a shelf. Employees advised S1 that all the narcotics were kept in the safe. An employee of iPharmacy stated that S1 made he/she go toward the safe while gesturing at his waistband as if he had a weapon/gun. Fearing for his/her safety, the employee opened two safes and S1 filled two pharmacy bags with bottles of narcotics. S1 also demanded cash but jumped back over the counter and fled the store when he was informed there was no cash in the register. The descriptions of the suspects:

- -S1: Black male, thin build, wearing a black ski mask, black long sleeve shirt, tan pants, and tan tennis shoes.
- -S2: Black male, thin build, wearing a black ski mask, black pants, black hoodie with "F.R.I.E.N.D.S" in multi-color on the front, and black shoes.
- -S3: Unknown driver of V1. Cannot be identified/described due to tinted windows.

- -V1: Dark Green Jeep Grand Cherokee (Unknown plate) with SRT body style with black rims and tinted windows.

12. A review of the DEA Form 106, Report of Theft or Loss of Controlled Substances, revealed approximately \$60,000 in stolen merchandise.

13. Subsequent phone record analysis revealed phones belonging to Kyree WILSON and Brandon JONES were utilizing cell phone towers in the vicinity of the pharmacy at the time of the robbery.

14. Below is a picture from the pharmacy exterior surveillance system of the green, Jeep Grand Cherokee used in the robbery at iPharmacy in Livonia, Michigan.



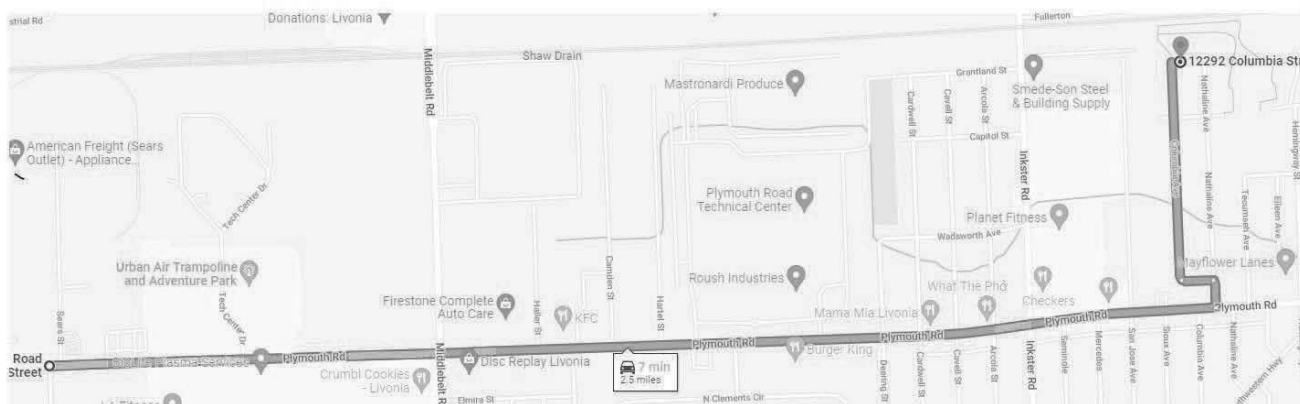
Traffic Stop of green Jeep on July 30, 2022.

15. The Livonia Police Department placed a “Be On the Lookout” (BOLO) message to area police departments. On July 30, 2022, Southfield Police officers located a matte green Jeep Grand Cherokee SRT with tinted windows and black rims bearing Michigan license plate#EKY5095. The vehicle matched the description of the suspect vehicle provided in the BOLO issued by the Livonia Police Department. Officers conducted a traffic stop and the driver was identified as Kyree WILSON, DOB XX/XX/2003. During the stop, officers observed two additional passengers present in the vehicle. The two passengers refused to identify themselves to the officers during the stop. Both were described as being younger black males with thin builds and one had short dread locks. WILSON advised that the vehicle he was driving belonged to his mother, the registered owner.



16. A check of the Jeep's license plate, MI Plate#EKY5095, utilizing the Law Enforcement Information Network (LEIN), revealed the vehicle to be a 2014 Jeep Grand Cherokee, VIN#1C4RJFDJXEC446852. The vehicle is registered to Tiffany Latoya Wilson, registered at 12XXX Columbia, Redford, Michigan. A LEIN check of Kyree WILSON revealed him to be approximately 6'2" and 160 pounds, which is consistent with one of the suspects involved in the robbery at the iPharmacy in Livonia, Michigan. This subject appeared to be taller than the others. As later described in this affidavit, WILSON's phone data places him in the geographical location of multiple pharmacy robberies consistent with the green Jeep he was stopped in.

17. Two days later, on August 2, 2022, agents/officers observed a matte green Jeep Grand Cherokee with tinted windows, black rims and a "hood scoop" backed into the driveway of 12XXX Columbia, Redford, Michigan, the vehicle's registered address. The address of 12XXX Columbia is within close proximity and in the direction towards where the suspect vehicle was last seen heading as it sped down Plymouth Road past Milburn Street after committing the robbery in Livonia. The 2014 Jeep Grand Cherokee VIN# 1C4RJFDJXEC446852 will be referred to as TARGET VEHICLE 1. (Below is a map showing the route from Plymouth and Milburn to the Columbia Street location).



The arrest of Kyree WILSON on July 28, 2021

18. On July 28, 2021, Kyree WILSON was arrested following a traffic stop in which he was driving TARGET VEHICLE 1 (Jeep). The traffic stop was conducted by Detroit Police Department and WILSON gave consent to officers to search the vehicle. During the search, officers located a handgun under the driver's seat in a compartment only accessible to the driver. It was determined that the handgun was stolen. During the search of the vehicle, officers also located a bottle of Promethazine cough syrup. WILSON stated that he did not have a prescription for it. During the iPharmacy in Livonia on July 19, 2022, S1 specifically demanded an employee provide Promethazine Codeine which is a cough syrup. Affiant knows through training and experience that this cough syrup is frequently abused on the streets and often mixed with a soft drink or juice and called "Lean."

The robbery of the Dearborn Pharmacy on August 5, 2022

19. On August 5, 2022, at approximately 1635 hours, Dearborn Police officers responded to a robbery at the Dearborn Pharmacy, located at 14715 Ford Road, Dearborn, Michigan. Employee statements and CCTV revealed the following: two subjects (S1 and S2), entered the pharmacy. S1 jumped the counter while S2 walked through a door to get on to the other side of the counter. Both suspects then approached an employee and demanded medication and money. During this interaction, S1 reached for his waist band as if concealing a weapon. S2 then walked to the front door while S1 instructed an employee to take him to the safe. The employee took S1 to the safe in the back room as S2 let S3 into the business by opening the back door of the pharmacy. The employee unlocked the safe and S1 grabbed approximately \$1,500 - \$1,600 of U.S. currency and a variety of narcotics (acetaminophen/codeine, acetaminophen/hydrocodone and 26 others). The suspects then exited out of the back door, entered a green Jeep Grand Cherokee, and fled the area.

20. Subsequent phone record analysis revealed phones belonging to Kyree WILSON, Jaleel WILEY and Brandon JONES were utilizing cell phone towers in the vicinity of the pharmacy at the time of the robbery.

21. The vehicle used in the robbery was confirmed as TARGET VEHICLE 1 (Jeep) via electronic surveillance. The electronic surveillance revealed that the TARGET VEHICLE 1 (Jeep) arrived in the area of 14715 Ford Road,

Dearborn, Michigan, at approximately 1632 hours and exited the area at approximately 1637 hours. Below is a still photograph from an exterior surveillance camera from the robbery depicting TARGET VEHICLE 1 (Jeep) as well as two of the three suspects who committed the robbery.



- -S1: Black male, approximately 19-20 years of age, wearing a black hoodie with white writing on the front and a red “V” on the back.
- -S2: Black male, wearing a blue mask, black Nike jacket and black Nike sweats.
- -S3: Black male wearing a tri-colored hoodie (light gray/dark gray/black).
- -S4: Unknown driver of the TARGET VEHICLE 1 (Jeep).

The arrest of Kyree WILSON on August 9, 2022 in Jeep

22. On August 9, 2022, Detroit Police Department (DPD) officers observed a matte green in color, Jeep Grand Cherokee bearing MI Plate#EKY5095 pass them traveling well above the posted speed limit. DPD attempted a traffic stop on the green Jeep which did not immediately pull over. When it did pull over, a DPD officer observed the driver moving around the vehicle before approaching it. The driver was identified as Kyree WILSON, DOB XX/XX/2003.

23. Because of the reckless driving, DPD officers seized the vehicle and conducted an inventory search prior to the vehicle (TARGET VEHICLE 1) being impounded. Officers recovered a handgun from inside the driver side window regulator. The handgun contained a 15 live round magazine with one live round in the chamber. Additionally, officers recovered (10) white in color, small round pills with a "5" on one side and "M" on the other from the driver side floorboard. A LEIN check of WILSON confirmed that he did not obtain a Concealed Pistol License (CPL). WILSON did not have a valid prescription for the pills which DPD identified as Ritalin. Affiant knows from training and experience Ritalin is a controlled substance that is abused on the streets for its stimulant producing effects and euphoric inducing sensations.¹

¹ <https://www.justice.gov/archive/ndic/pubs6/6444/index.htm>

24. At the time of WILSON's arrest, the passengers in TARGET VEHICLE 1 (Jeep) were identified as Dashawn COSBY (DOB) XX/XX/2002 and Brandon JONES (DOB XX/XX2003) by officers.

**The robbery at the Heights Family Pharmacy in Dearborn Heights on
August 15, 2022.**

25. On August 15, 2022, at approximately 1055 hours, Dearborn Heights Police officers responded to 25524 Ford Road, the Heights Family Pharmacy, for a robbery that just occurred. Employee statements and CCTV revealed the following: two subjects (S1 and S2) entered the pharmacy and approached employees at the counter. S1 jumped the counter and demanded an employee take him to the safe. S1 grabbed the employees' arm as the employee took him to the safe. Once at the safe, the employee opened it. S2 opened a backpack as S1 and S2 placed narcotics from the safe inside the backpack.

26. The suspects then demanded to be taken to the back door of the pharmacy. The suspects were guided to the back door of the pharmacy where they ran to an SUV. Once inside the SUV, they fled the area.

27. Subsequent phone record analysis revealed a phone belonging to Jaleel WILEY was utilizing cell phone towers in the vicinity of the pharmacy at the time of the robbery.

28. One subject appears to be wearing similar clothing, a dark colored sweatshirt with “V” on the back, as a suspect in the August 5, 2022 robbery in Dearborn, Michigan. Also, the suspect walked similarly (bow legged) to the suspect in the August 5, 2022 robbery.

- -S1: Black male, approximately 16-20 years of age, wearing a black hoodie with a red “V” on the back of it, gray ripped jeans and a white surgical mask
- -S2: Black male, approximately 16-20 years of age, wearing a black hoodie, gray/black jeans, a blue surgical mask, and carrying a black/gray backpack.

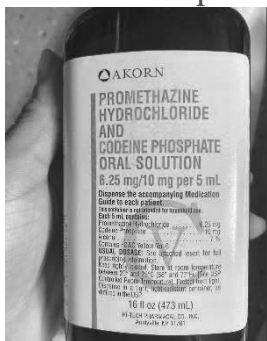
29. A search warrant authorized forensic analysis of Jaleel WILEY’s phone (TARGET PHONE 3) following his arrest on August 26, 2022, in Dearborn, Michigan, revealed an internet search history that included an internet search on August 15, 2022, titled “Pharmacy near me” Affiant knows the Heights Family Pharmacy was robbed on August 15, 2022.

30. Additionally, analysis of TARGET PHONE 3 revealed a photo of Promethazine Hydrochloride and Codeine Phosphate Oral Solution (listed on the device as IMG_0083) that was captured on August 15, 2022, at 1131 hours.

31. Further, forensic analysis of TARGET PHONE 3 revealed text messages from Jaleel WILEY to phone number (313) 917-3XXX saved to WILEY’s device as “Ree.” Affiant learned via law enforcement databases and court order that phone number (313) 917-3XXX belongs to Kyree WILSON as

referenced later, in this affidavit as TARGET PHONE 1. See text messages between WILSON and WILEY below.

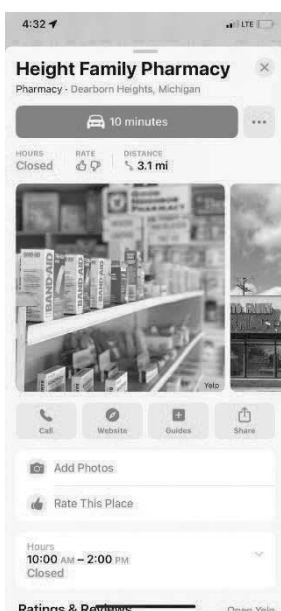
- a. WILEY: 1132 hrs: Sent IMG_0083 Promethazine Hydrochloride and Codeine Phosphate Oral Solution



- b. WILSON : 1328 hrs: “U went?”
- c. WILEY: 1335 hrs: “Yea an a flex y’all wasn’t gone come.”
- d. WILSON: 1336 hrs: “Bro you say anything”
- e. WILSON: 1336 hrs: “Woke up at 9:00 I said be on the way”
“U said no im waiting on bro wit the scat”
- f. WILEY: 1337 hrs: “Right never came so we drove the flex and y’all say y’all need something fast just because.”

32. Agents/Officers investigation has revealed that a black Ford Flex was used as the getaway vehicle on August 15, 2022. Affiant understands that the text messages above are consistent with WILEY using a Ford Flex during the robbery and obtaining Promethazine. This text was sent approximately 30 minutes after the robbery. It is also noted that a review of the phone associated to Jaleel WILEY (TARGET PHONE 3) place him in the geographical area during the robbery.

33. Additional phone analysis revealed a screen shot of the Heights Family Pharmacy. This photo was dated August 13, 2022, just two days prior to the robbery. During surveillance, agents/officers have observed subjects canvassing the area of pharmacies prior to committing robberies. (See attached for a screen shot recovered from Jaleel WILEY (TARGET PHONE 3)).



August 19, 2022, Robbery at Simple Script Pharmacy in Dearborn,
Michigan

34. On August 19, 2022, at approximately 1415 hours, Dearborn Police responded to 14234 Warren, the Simple Script Pharmacy, for a robbery that just occurred. Employees inside the business stated that two black males entered the store and stated, “Open the safe before someone gets hurt.” Once the safe was opened by an employee, one of the suspects began taking medications and cash

from the safe. Another suspect jumped over the counter and waited for the other suspect to finish taking items from the safe. Both suspects then fled the business from the rear door. An eyewitness stated that he/she observed two individuals run from the business into the alley and enter a white SUV that left north on Williamson. The same witness believed he/she observed a handgun partially concealed on one of the suspects.

35. A canvas of the area revealed a surveillance camera in the area which recorded a newer style white, Jeep Grand Cherokee traveling north on Williamson and then west of Gould around the time of the robbery.

36. A search warrant authorized forensic analysis of Jaleel WILEY's phone (TARGET PHONE 3) following his arrest on August 26, 2022, in Dearborn, Michigan, revealed an internet search history at 1333 hours for "Simple Script Pharmacy" on August 19, 2022. This particular pharmacy was robbed just after 1400 hours. See photo below for the search of Simple Script Pharmacy.



37. Further analysis of Jaleel WILEY's Phone (TARGET PHONE 3) revealed a contact labeled as "Twin" with phone number of 313-413-1XXX. (TARGET PHONE 4) Agents/Officers know Jaleel WILEY to have a twin brother, Janeil WILEY. Law enforcement databases have confirmed that TARGET PHONE 4 is associated with Janeil WILEY.

38. Analysis of TARGET PHONE 3 and TARGET PHONE 4 revealed both devices to be in the area of 37XXX Scotsdale Circle Westland, Michigan prior to the August 19, 2022 robbery. Agents/Officers know this address to be associated to the WILEY brothers as a residence. Both devices then moved to the area of Grand River and McNichols in the City of Detroit, Michigan.

39. Later, on August 19, 2022, TARGET PHONE 4 data reveals the device to be in the geographical area of the Simple Script Pharmacy just prior to the business being robbed.

40. Moments following the robbery, both TARGET PHONES are again in the same geographical area.

41. Agents/Officers know through training and prior experience that individuals often times manipulate or facilitate their phones in order to avoid detection by law enforcement. Considering the pattern of the TARGET PHONES being together prior to the robbery and following the robbery, agents/officers are led to believe that both phones, as well as Jaleel and Janeil WILEY, were present during the robbery.

42. The next day, August 20, 2022, following a similar pattern, while conducting surveillance, agents/officers located a white Jeep Grand Cherokee with a Florida license plate that matched the description of the suspect vehicle used in the robbery that occurred on August 19, 2022, in Dearborn, Michigan, was at 37XXX Scotsdale Circle, Westland, Michigan. Again, this is a known residence of Jaleel and Janeil WILEY. Agents/Officers observed Jaleel and Janeil WILEY traveling together in the white Jeep Grand Cherokee. The white Jeep Grand Cherokee traveled to Fairlane Mall in Dearborn, Michigan.

43. A surveillance photo (see below left) of Janeil WILEY was captured at the Fairlane Mall by agents/officers. The photo of Janeil WILEY closely resembles the suspect (see photo below right) observed via surveillance video at the robbery in Dearborn, Michigan, on August 19, 2022, and described by victims' statements.



**The robbery of the RX Canada Direct Pharmacy in Dearborn on August
26, 2022.**

44. On August 26, 2022, at approximately 1535 hours, agents/officers were conducting surveillance of a black, 2022 Tesla Model Y (MI Plate#EPU14XX) parked on a street near the RX Canada Direct business located at 23541 Ford Road in the city of Dearborn, Michigan. Agents/officers observed a black male wearing all black clothing including a hooded sweatshirt with the hood on his head, and white shoes exit the passenger side of the Tesla. The black male was seen entering the front door of RX Canada Direct. After a short time, agents/officers observed JOHNSON and a female running from the front door of the business. Believing a robbery had occurred, agents/officers took the black male subject, later identified as Jayson JOHNSON (XX/XX/2003), into custody at the northeast corner of 23527 Ford Road.

45. Agents/officers also arrested the driver of the Tesla, Jaleel WILEY, after he attempted to flee. Agents/officers interviewed the employee who stated JOHNSON had entered the store and immediately began asking for medication. The employee stated the business did not keep medication in the store. The employee attempted to call 9-1-1 and JOHNSON knocked the phone out of her hand preventing her from calling for help. The employee attempted to run out of the store and JOHNSON grabbed her to prevent her from leaving. JOHNSON then fled out of the store where he was apprehended.

46. Agents/officers impounded the Tesla and obtained a search warrant to search the vehicle, signed by Honorable Judge Sam Salamey, of the 19th District Court. The search of the Tesla revealed the following items:

g. (3) Cellphones

i. iPhone 11

ii. iPhone XR

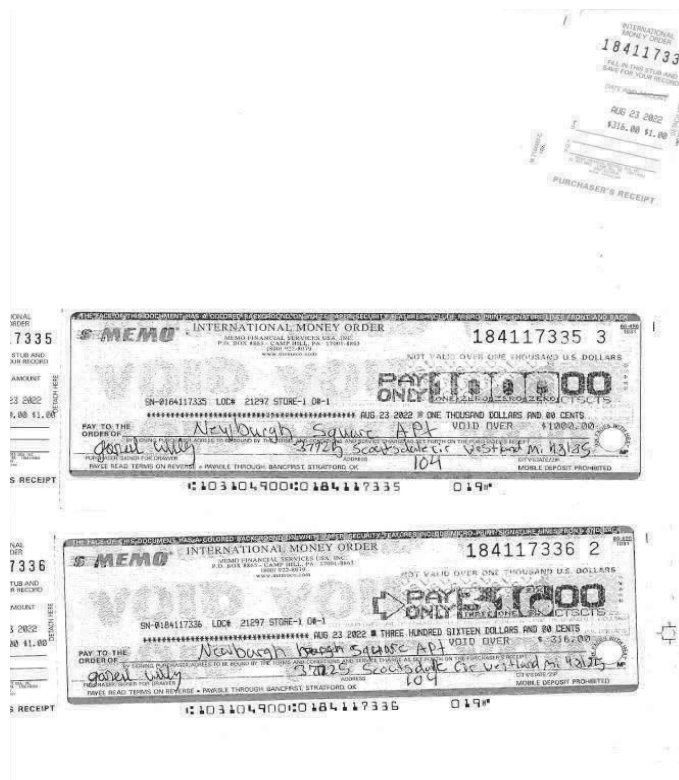
iii. Black Schok Volt Phone

h. (1) Handgun, Reported Stolen from Farmington Hills on 8/18/22

i. (1) Promethazine Plain Syrup Side Effect Booklet

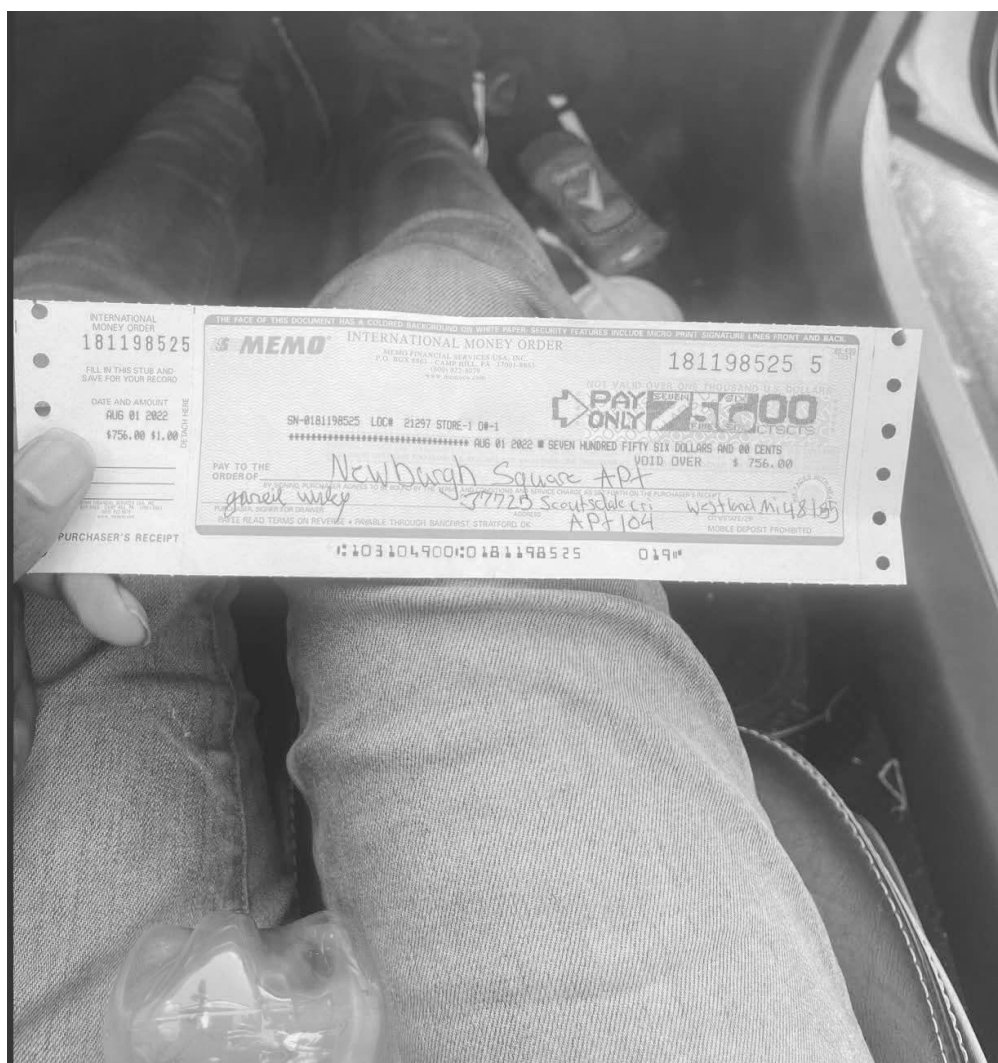
j. (1) Prescription Bottle

k. (1) Copy of a check with receipt, signed by Janeil WILEY, payable to the Newburgh Apartments address: 37XXX Scotsdale Circle Westland, Michigan, Apt. #104. See photo below.



47. Another search warrant was signed by Honorable Judge Sam Salamey of the 19th District Court for a search of the (3) phones located in the Tesla. It was determined that the black, Schok Volt phone was registered to Jaleel WILEY and was assigned a phone number of (248) 249-9XXX. The search of the phone also revealed recent search history for “Todd’s Health Mart Pharmacy” in Dearborn Heights, Michigan, “Westland Maple Drugs” in Westland, Michigan, “2020 Middlebelt”, which a search of the address revealed it to be the Minute Script Sav-Mor Pharmacy” in Garden City, Michigan, and “H&A Health Pharmacy” in Westland, Michigan. The phone had no saved contacts aside from the factory settings numbers, and only showed three recent calls.

48. A forensic examination of the other two phones located in the Tesla was conducted. The examination revealed the iPhone 11 was registered to Jaleel WILEY with phone number (248) 379-0XXX (TARGET PHONE 3). A search of media on the iPhone 11 also revealed a picture of a check made out to the Newburg Square APT, Address of 37XXX Scotsdale Circle, Apt 104, Westland, Michigan, signed by Janeil WILEY.



Phone data review

49. An investigation by agents/officers revealed that phone number (313) 917-3XXX was provided by Kyree WILSON on several occasions including his Detroit Police arrest on August 9, 2022. Open-source databases also show that the number belongs to WILSON. Affiant queried the number and found that the number is registered to WILSON's mother, Tiffany WILSON.

50. Affiant was able to identify a recent number for Tiffany WILSON as (313) 329-8XXX, through contacts with Detroit Police, as recent as April, 2022. This phone number is utilized by her as her main number. This would indicate that the number used by Kyree WILSON is (313) 917-3XXX, as he provided the number to police during an arrest in August, 2022.

51. Kyree WILSON's phone number (313) 917-3XXX (TARGET PHONE 1) was confirmed through legal process, including GPS location data and Call Data Records from AT&T.

52. The GPS location data of WILSON's phone (TARGET PHONE 1) was consistent with WILSON's location, which was confirmed by agents/officers via surveillance on several occasions. Surveillance also revealed WILSON to be accompanied by Brandon JONES and Dashawn COSBY. It is clear from contacts and surveillance that these individuals are close associates.

53. Affiant investigated TARGET PHONE 1 (WILSON) cellular records, paying particular attention to the days of the robberies. Through those records, Brandon JONES was identified as being the subscriber of phone number (313) 257-5XXX. JONES' phone number is in frequent contact with TARGET PHONE 1 (belonging to WILSON). After being discharged from probation with MDOC on May 4, 2022, JONES indeed provided his number as (313) 257-5756.

54. Brandon JONES' cellular device, utilizing phone number (313) 257-5XXX, will be referred to TARGET PHONE 2.

55. Dashawn COSBY was observed with WILSON via surveillance and identified through close association with WILSON from contact with law enforcement. Via records, COSBY is the account holder of phone number (313) 364-3XXX. COSBY's phone number, was in frequent contact with WILSON (TARGET PHONE 1).

56. Records for COSBY 's and JONES' numbers revealed a commonly contacted number, (248) 379-0XXX. Agents/officers determined that the number belonged to Jaleel WILEY. According to records, Jaleel WILEY is the subscriber of the number with a listed address of 11XXX Abington, Detroit, Michigan.

57. On August 25, 2022, Jaleel WILEY indeed provided (248) 379-0XXX to a Michigan Department of Corrections probation officer. Via surveillance, WILEY often resides at 37XXX Scottsdale Circle #104 in Westland, Michigan. It

should be noted that WILEY's residence is in very close proximity to the pharmacy located at 8653 Newburgh in Westland, Michigan that was robbed on August 2, 2022. Further, surveillance revealed WILEY to be with WILSON and JONES on several occasions and to share frequent contacts with their respective phone numbers. Surveillance paired with cell phone data shows all persons at WILEY's residence in Westland, Michigan on multiple occasions. WILEY fits the height, weight, and stature of the suspects involved in the robberies in the Metro Detroit Area, and has multiple warrants, including absconding from probation for weapons offenses.

58. Jaleel WILEY's phone, (313) 379-0XXX is referred to as TARGET PHONE 3.

59. Affiant previously identified Janiel WILEY's cellular number as 313-413-1XXX (TARGET PHONE 4).

Target Phones at robberies

60. Call Data Records were reviewed for the TARGET PHONES (1-4). The data confirms that TARGET PHONE 1 (belonging to WILSON) and TARGET PHONE 2 (belonging to JONES) were in the geographical area of the robbery of the iPharmacy on July 19, 2022, in Livonia, Michigan. Prior to the robbery, TARGET PHONE 1 (WILSON) stops near COSBY's home, then travels

to the iPharmacy on Plymouth Road in Livonia, Michigan. During this robbery, it is known that two black males entered the store, and a third male was a driver.

61. Call Data Records were reviewed for the robbery on August 5, 2022, at the Dearborn Pharmacy, 14715 Ford Road, Dearborn, Michigan. The data confirms that TARGET PHONE 1 (WILSON), TARGET PHONE 2 (JONES) and TARGET PHONE 3 (Jaleel WILEY) were in the geographical area of the robbery. Not only do the phone records confirm this, but electronic surveillance also places TARGET VEHICLE 1 (Jeep) at or near the scene of the robbery. Three black males were involved in the robbery, and one subject was the driver.

62. Call Data Records were reviewed for the robbery on August 15, 2022, at the Heights Family Pharmacy, 25524 Ford Road, Dearborn Heights, Michigan. A review of this data revealed TARGET PHONE 3 (Jaleel WILEY) in the geographical area of the robbery. According to video from the robbery, one of the suspects appears to be wearing the same dark colored sweatshirt with a “V” marking on the back that was worn by a suspect involved in the August 5, 2022 robbery in Dearborn, Michigan.

63. A review of Call Data Records on and around the time of the robbery on August 19, 2022, revealed TARGET PHONE 3 (Jaleel WILEY) and TARGET PHONE 4 (Janeil WILEY) in the geographical area of the robbery. The following

day, surveillance observed both WILEY brothers traveling in a vehicle matching the description of the vehicle used in the August 19th robbery.

64. For the attempted robbery on August 26, 2002, both Jayson JOHNSON and Jaleel WILEY were apprehended, and three cellphones were recovered from the Tesla vehicle.

SURVEILLANCE SUMMARY and ASSOCIATION OF TARGETS

65. The investigation has revealed various addresses of interest, likely linked to the potential location(s) of evidence stemming from these multiple robberies. On August 5, 2022, a robbery of a pharmacy in Dearborn, Michigan occurred at 14715 Ford Road. A review of the electronic surveillance data from TARGET VEHICLE 1 (Jeep) revealed it was at the area of 20XXX Indian Creek Drive #8 (SUBJECT PREMISE 1) prior to traveling to the area of 14715 Ford Road. The data suggests that TARGET VEHICLE 1 was at the scene of the robbery. Following the robbery, electronic surveillance data reveals, TARGET VEHICLE 1 arrived in the area of 12XXX Columbia (SUBJECT PREMISE 2). SUBJECT PREMISE 2 is a known address of Kyree WILSON and his parents. According to surveillance, TARGET VEHICLE 1 is then stationary for approximately 28 hours.

66. Surveillance observed COSBY exit and later re-enter the SUBJECT PREMISE 1 on August 16, 2022. The next day, WILSON, COSBY, and JONES all exited SUBJECT PREMISE 1 and entered a red Chrysler. Again, the following the day, surveillance observed WILSON, COSBY, and JONES exit the SUBJECT PREMISE 1. The three traveled together in the same red Chrysler to SUBJECT PREMISE 4 where two other subjects exited the residence and entered the red Chrysler. One of the subjects who exited SUBJECT PREMISE 4 was identified during the surveillance as Janeil WILEY. After a few stops, the group traveled to SUBJECT PREMISE 1 where all subjects went into the residence. Based on the surveillance observations as well as phone record data, suggesting frequent contacts between them, WILSON, COSBY, and JONES are close acquaintances.

67. During the month of August 2022, WILSON, COSBY, and WILSON are observed together by surveillance numerous times. Phone data also suggests that during the robbery on August 5, 2022, WILSON, JONES, and Jaleel WILEY were in the geographical area of the robbery at the time of the robbery.

68. WILSON was arrested on August 9, 2022, during a traffic stop. With him in the vehicle that was stopped, was COSBY and JONES, further indicating that these subjects are close acquaintances.

69. On August 19, 2022, phone data suggests that Jaleel WILEY and Janeil WILEY were in the geographical vicinity of the robbery that transpired that

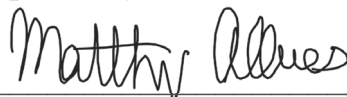
particular day. Jaleel WILEY and Janiel WILEY are brothers and have been observed during surveillances several times leading affiant to believe that the brothers are close and spend time together.

70. The above illustrates that the subjects are involved in close relationships with the others. Combined with surveillance, phone data, and other evidence, affiant concludes that probable cause exists that the subjects acted in concert during the planning, participation, and execution in many of the numerous robberies being investigated by the FBI and other law enforcement agencies.

CONCLUSION

71. Based on the foregoing, there is probable cause to believe that KYREE WILSON, BRANDON JONES, JALEEL WILEY, JANEIL WILEY have violated 18 U.S.C. § 2118(b) (Robberies and Larcenies Involving Controlled Substances).

Respectfully submitted,



Matthew Allwes, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

Dated: September 14, 2022